



IDAHO DEPARTMENT OF FISH AND GAME

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Boise, Idaho 83707

C.L. "Butch" Otter / Governor
Virgil Moore / Director

Niagara Springs Fish Hatchery
2131 Niagara Springs Road
Wendell, Idaho 83355
(208) 536-2283

March 21, 2014

Mr. Chris Gebhardt
U.S. Environmental Protection Agency
Region 10, OCE-133
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101

Subject: High phosphorus discharge for February, 2014

Dear Mr. Gebhardt:



On March 4, 2014, the Idaho Department of Fish and Game provided notification to your office of an apparent exceedance of the allowable instantaneous maximum phosphorus discharge load from Niagara Springs Fish Hatchery (NPDES Permit No. 130013) occurring on February 6, 2014. Based on these initial findings, additional effluent water samples were collected on February 28, 2014. Results from this second sampling effort were reported to hatchery staff by the Rangen Research Laboratory on March 18, 2014. Utilizing laboratory results and hatchery water flow data, an instantaneous maximum phosphorus discharge load of 26.1 lbs/day was calculated. This is within the allowable limits for instantaneous maximum phosphorus discharge load for the first trimester (Jan –Apr) of the calendar year (32.6 lbs/day). These data were then combined with the February 6 data to calculate an average monthly phosphorus discharge load of 35.3 lbs/day. Results from this effort exceed the allowable monthly average phosphorus discharge load for the first trimester (Jan –Apr) of the calendar year (22 lbs/day). I placed a phone call to your office to report the apparent noncompliance on March 19, 2014 at 4:30 pm (MST). While the exact cause for this elevated phosphorus discharge cannot be determined with certainty, we believe it is a function of a change in sampling protocol, and may not represent noncompliance with the permit.

Niagara Springs Fish Hatchery routinely uses automated composite samplers to collect effluent water samples. In December 2013, these samplers were damaged by extreme cold weather and were unavailable at the time of the February 2014 sampling efforts. In place of the automated 24-hour composite, manually collected 8-hour composite samples were taken on February 6, 2014 and again on February 28, 2014. The 8-hour composite samples consisted of four discrete aliquots collected at two hour intervals during daylight hours. This period represents the most active segment of the day, capturing peak feeding, cleaning, and fish activity, and does not accurately represent the facility's overall effluent water quality during a 24-hour period.

Keeping Idaho's Wildlife Heritage

The hatchery has acquired new automated composite samplers for use beginning in April, 2014. We are confident that this will allow collection of effluent water samples that accurately represent the operation of the facility and demonstrate compliance with the total phosphorus discharge limits of the NPDES permit. Please feel free to contact me if you have any further questions or concerns.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jerry Chapman", is written over a horizontal line.

Jerry Chapman
Hatchery Manager 2
Niagara Springs Fish Hatchery

CC: Mr. Dirk Helder, EPA
Mr. Craig Thomas, IDEQ
Mr. Paul Abbott, IPC
Mr. Gary Byrne, IDFG
Mr. Richard Lowell, IDFG
Mr. Brian Thompson, IDFG